REMARKS

Applicants respectfully request reconsideration of this application. Claims 1-6 and 9-12 are pending. Claims 1-6 and 10-12 have been amended. No new matter has been added. Claims 13-15 have been canceled without prejudice.

REJECTIONS UNDER 35 U.S.C. §§ 102 & 103

The Examiner rejected claims 1 and 9-12 under 35 U.S.C. § 102 as being anticipated by U.S. Patent Publication No. 2002/0067859 to Nicholson et al. ("Nicholson"). The Examiner also rejected claims 1-3, 5-6 and 9-12 under 35 U.S.C. § 103(a) as being unpatentable in view of Nicholson and U.S. Patent Publication No. 2003/0121007 to Coleman et al. ("Coleman").

Applicants have amended claim 1 to clarify the currently claimed invention and incorporate the subject matter of claim 13 into claim 1 although Applicants disagree with the Examiner's rejection. The object describing unit of claim 1, as amended, links one or more additional objects with an object among multiple objects generated by dividing an image. The additional objects are *newly created objects other than the multiple objects* and include an additional object having an image pattern and an additional object that brings the image pattern into invisible state, as recite in claim 1. Moreover, the size of the additional object having the image pattern *equals* the size of the linked object constituting the image data as required by claim 1.

Nicholson does not disclose or suggest such limitations. Nicholson proposes a

hybrid data structure describing recognized and unrecognized words for a bitmapped image. The recognized words are displayed as a raster image rendered from codes, and the unrecognized words are displayed using the original bitmapped image.

In paragraph [0100], Nicholson states that the hybrid data structure can be stored as a PDF file, and to take advantage of the text search functionality of the PDF format, unrecognized words can be stored as "invisible" text, as well as non-coded bitmaps. Nicholson further states that the "invisible" text can be displayed by having the same color as the background to appear "invisible."

However, even assuming that the "invisible" text corresponds to an additional object as claimed in claim 1, the displayed "invisible" text does not teach or suggest that the size of the additional object should *equal* that of the linked original object in an image as required by claim 1. *Regardless of* the size of a displayed object, *only if* the color of the displayed object is the same as the background or transparent, the displayed object can be "invisible."

Furthermore, unlike the Examiner's assertion, Element 318 in Figure 12a of Nicholson does not teach or suggest the size of the additional object should *equal* that of the linked original object in an image as required by claim 1. In Nicholson, each identifiable word can be associated with a value of "confidence level" as shown in Figures 7a and 7b, and a threshold determines whether or not a word can be recognized. Nicholson provides an editor text window 312 as shown in Figure 12a, which always

displays all words in their coded form regardless of their confidence level and does not display non-coded bitmaps. Via the editor text window 312, a user is able to correct wrongly identified words, and as a result, a confidence level of 100% is assigned to the corrected words. (See pars. [0101] through [0104]; Figures 12 and 12a) The black-colored box area around element 318 merely indicates that element 318 is highlighted so that the user can correct element 318 (from "decrement" to "document") via the editor text window 312.

Please note that the bitmap form 320 of element 318 is displayed in a *separate window* 322 while element 318 (of the coded form) is displayed in the editor text window 312. Displaying a *single* object in different forms in **separate, differently-sized display windows** does <u>not</u> suggest that the size of a *newly created additional object is equal to* that of the linked *original object* in an image as required by claim 1. Indeed, no part of Nicholson teaches or suggests that the size of a newly created additional object equals that of the linked original object in an image as required by claim 1.

Coleman does not remedy the deficiencies of Nicholson. In Coleman, *a human user* (not a machine) selects a *desired print-quality characteristic* for an image object via user interfaces 20, 36, 60 and 36 provided in a printer as shown in Figures 1-2, 3, 4 and 5, respectively. Thus, Coleman does not teach or suggest any pertinent features of claim 1, which is directed to a machine, *i.e.*, an image processing apparatus.

Because neither Nicholson nor Coleman, alone or in combination, teaches or

suggests " ... wherein a size of the additional object comprising the image pattern equals that of the object having the predetermined image attribute," as recited in claim 1, Applicants respectfully request withdrawal of the rejections of claim 1 under 35 U.S.C. §§ 102 and 103 in view of Nicholson and Coleman.

Claims 2-6 and 9 depend from independent claim 1, which is patentable over the cited references. Thus, at least for the reasons discussed above, Applicants respectfully submit that claims 2-6 and 9 are also patentable over the cited references.

Claims 10-11, as well as claim 12 dependent upon claim 11, contain similar limitations as the limitations of claim 1. Thus, at least the reasons discussed above, Applicants respectfully submit that claims 10-12 are patentable over the cited references.

In view of the foregoing, Applicant respectfully submits the present application is now in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call the undersigned attorney at (408) 720-8300.

Please charge Deposit Account No. 02-2666 for any shortage of fees in connection
with this response.

Respectfully submitted,

BLAKELY SOKOLOFF TAYLOR & ZAFMAN LLP

Date: _____

By: _____

Michael J. Mallie
Reg. No. 36,591

1279 Oakmead Parkway
Sunnyvale, California 94085-4040
(408) 720-8300